



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

CRH/JMH/EHS  
F. #2017R00906

*271 Cadman Plaza East  
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August 3, 2021

By Email and USAFx

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Re: United States v. Michael McMahon  
Criminal Docket No. 21-265 (PKC)

Dear Counsel:

Enclosed please find additional discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure, supplementing our productions dated May 5, May 25, and July 12, 2021. The government also requests reciprocal discovery from the defendant. Pursuant to Rule 16.1 of the Federal Rules of Criminal Procedure, the government remains available to confer further about pretrial discovery at a mutually convenient time.

The materials provided with today's production are being provided subject to the protective order agreed to by the parties and entered by the Court on June 18, 2021. See ECF No. 70 ("the Protective Order").

Today's production will be delivered via the USAFx platform. We recommend that you download a copy of the production for your archives as soon as practicable. Please do not hesitate to contact us if you have any difficulty accessing or downloading the production.

Today's production includes the contents of Apple iCloud accounts associated with the defendant, contained within a folder bearing Bates number MM-000562. These materials were obtained from Apple pursuant to a search warrant, the documentation of which

has been previously provided to you. See MM-000375 through MM-000455. A forensic report relating to this iCloud material is also enclosed, bearing Bates numbers MM-000563 through MM-000566. Selected items drawn from iCloud accounts associated with defendant Zhu Yong are also enclosed, bearing Bates numbers MM-000567 through MM-000575.

Travel and visa records obtained from Customs and Border Protection (“CBP”), and associated with co-defendants Hu Ji, Li Minjun, Tu Lan, and Zhu Feng, as well as other co-conspirators, are enclosed, bearing Bates numbers MM-000576 through MM-000699. These items have been designated as “sensitive discovery material” as that term is defined in the Protective Order.

Records obtained from Embassy Suites (Elizabeth, New Jersey) and the Edison Hotel (New York, New York), associated with lodging obtained by various co-defendants, are enclosed bearing Bates numbers MM-000700 through MM-000708.

Records obtained from GoDaddy.com in connection with an electronic account associated with the defendant are enclosed, bearing Bates numbers MM-000709 through MM-000824.

Correspondence from the New Jersey Motor Vehicle Commission is enclosed, bearing Bates numbers MM-000825 through MM-000826.

The folder bearing Bates number MM-000827 contains records obtained from Oath, Inc., associated with an AOL electronic account associated with the defendant.

Records obtained and correspondence received from TDBank in connection with financial accounts associated with the defendant and the defendant’s relatives are enclosed, bearing Bates numbers MM-000828 through MM-001654.

Records obtained from Thumbtack, Inc., an Internet services provider, are enclosed, bearing Bates numbers MM-001655 through MM-001683; these records are associated with an account belonging to the defendant at Thumbtack.

Records obtained from United Airlines, Inc., in connection with travel by various defendants and other relevant individuals are enclosed, bearing Bates numbers MM-001684 through MM-001846. Please note that these records have been designated as “sensitive discovery material” as that term is defined in the Protective Order.

A forensic report relating to certain video material described in the superseding indictment (ECF No. 76, see ¶¶ 50-54) is enclosed, along with the underlying contents, all contained within the folder bearing Bates number MM-001847. A narrative report summarizing this material is also enclosed, bearing Bates number MM-001848 through MM-001850. Please note that these materials have been designated as “sensitive discovery material” as that term is defined in the Protective Order.

Future Discussions

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Please be advised that, pursuant to the policy of the Office concerning plea offers and negotiations, no plea offer is effective unless and until made in writing and signed by authorized representatives of the Office. In particular, any discussion regarding the pretrial disposition of a matter that is not reduced to writing and signed by authorized representatives of the Office cannot and does not constitute a “formal offer” or a “plea offer,” as those terms are used in Lafler v. Cooper, 132 S. Ct. 1376 (2012), and Missouri v. Frye, 132 S. Ct. 1399 (2012).

Very truly yours,

JACQUELYN M. KASULIS  
Acting United States Attorney

By: /s/ J. Matthew Haggans  
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Enclosures (via USAFx)

cc: Clerk of the Court (PKC) (by ECF) (without enclosures)